

# EXHIBIT A

## CEQA ADDENDUM

### Initial Study/Mitigated Negative Declaration

SCH No. 2012051069

### Allegretto Resort Expansion-Planned Development

Assessor Parcel Numbers: 025-410-019, 025-410-020, 025-410-021, and  
025-410-004

Location: 2700 Buena Vista Drive  
Paso Robles, CA

Planned Development (PD25-06)  
Rezone (RZN 25-02)  
General Plan Amendment (GPA25-02)

#### **Applicant:**

Ayres Paso Robles, Ltd.  
355 Bristol Street, Suite A  
Costa Mesa, CA 92626-7923

#### **Lead Agency:**

City of Paso Robles  
1000 Spring Street  
Paso Robles, CA 93446

#### **Staff Contact:**

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## I. INTRODUCTION

### A. Determination

The City of Paso Robles is processing an application for Allegretto Resort Expansion, an expansion of the existing Allegretto Resort on to adjacent land previously part of Cuesta College on Buena Vista and Dallons Drive in northern Paso Robles (“Project”). The 10.8 -acre site needs a General Plan Amendment, Rezone, and Development Plan to accommodate the proposed resort expansion.

This document constitutes an Addendum to the July 2012 Mitigated Negative Declaration (MND or 2012 MND) prepared for the Ayres Paso Robles, Ltd. project (GPA 12-001, REZONE 12-001, Tentative Parcel Map 12-004, Borkey Specific Plan Amendment 12-001, Planned Development 12-001, Conditional Use Permit 12-003). This Addendum evaluates whether the Project, the 10.8-acre Ayres Hotel expansion, would result in any new or substantially more adverse significant effects or require any new or modified mitigation measures as compared to the 2012 MND.

As lead agency, and as part of the City’s due diligence, the City required an updated Traffic Impact Study, Air Quality and Greenhouse Gas Emissions Analysis, Biological Resource Assessment, Cultural Study, and Arborist Report to determine if the Project would result in any new or more severe significant effects not identified in the MND. Based on these studies, and a full analysis of the scope of the Project, and the previously adopted 2012 MND, none of the criteria specified in CEQA Guidelines section 15162 requiring a subsequent or supplemental environmental document to be prepared is triggered. In particular, there have been no: (1) substantial changes in the project that will require major revisions to the previous MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effect; (2) substantial changes with respect to the circumstances under which the Project is undertaken that will require major revisions to the previous MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effect; and (3) new information of substantial importance that was not known and could not have been known at the time the previous MND was adopted that shows: (a) the Project would have significant effects not discussed in the previous MND; (b) the Project would have more severe environmental effects than shown in the MND; or (c) mitigation measures previously found to be infeasible or new mitigation measures now exist and would be feasible and would reduce significant effects. Therefore, an addendum is the appropriate document under CEQA to analyze the consistency of the Project with the type and intensity of development previously analyzed for the site in the MND as provided for in CEQA Guidelines section 15162 and 15164.

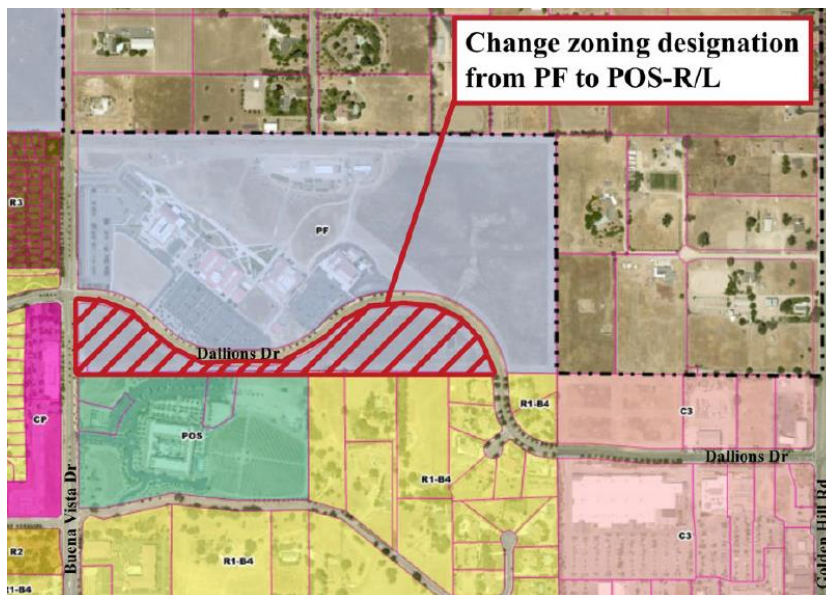
This Addendum incorporates the mitigation measures detailed in the MND. The incorporation of these measures ensures that previously adopted mitigation will be implemented for the Project and that no significant impacts will result from the Project and no new or increased significant impacts will result from the Project. All impacts will be reduced to a less-than-significant level with the existing, new, and modified mitigation measures.

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## B. Background

Ayres Paso Robles, LP has acquired the 10.8-acre property to the north of the existing Allegretto site (APN 025-410-004). The Project site involves an expansion of the existing resort hotel (APN:025-410-020, 025-410-021, 025-410-019).

On July 17, 2012, the City adopted a Mitigated Negative Declaration and rezoned three parcels (APNs 025-410-019, 025-410-020, and 025-410-021) to Parks and Open Space with Resort-Lodging Overlay in conjunction with approval of a General Plan Amendment and Tentative Parcel Map. The project was approved with specific conditions of approval and accompanying mitigation measures, which have been incorporated into the Addendum.



Ayres is seeking to incorporate , the 10.8-acre property, on the south side of Dallons Drive (see exhibit above) into the Allegretto Resort campus. In order to do this, the 10-8 acre site needs to be designated POS - Parks and Open Space zone with a Resort Lodging overlay to align with the current Allegretto parcel. The Cuesta property to the North and East of the subject property are zoned PF Public Facilities. This property is bordered by Dallons Drive thus creating a natural buffer to the subject site. West of the site across another buffer, Buena Vista Drive, are CP - Commercial-Neighborhood zoned properties. Adjoining the subject property to the South is the Allegretto Resort and further east and south are properties zoned R1 – Residential Single Family with a B4 overlay.

Ayres seeks to amend Planned Development 12-001 and Conditional Use Permit 12-003 for the Allegretto resort property to incorporate the new parcel and expanded resort.

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The Project applicant is now seeking the following entitlements to allow for construction of a resort hotel expansion consistent with the 2012 MND, related CEQA documents, and the City's General Plan:

- Planned Development/Conditional Use Permit
- Rezone
- General Plan Amendment
- Borkey Specific Plan Amendment

## C. Addendum Purpose

The purpose of this Addendum is to analyze the consistency of the Project with the type and intensity of uses previously analyzed for the site in the 2012 MND and related environmental documents. As documented in this Addendum, none of the conditions stated in CEQA Guidelines section 15162 have been met and therefore there is no need for a subsequent environmental impact report. This Addendum, together with the MND, and previous environmental documents incorporated by reference, will be relied on by the City when considering approval of the Project.

This Addendum has been prepared to comply with CEQA Guidelines section 15164 and Public Resources Code sections 21083 and 21166.<sup>1</sup> The Addendum uses an environmental checklist to evaluate each environmental topic area within Appendix G of the CEQA Guidelines. This Addendum applies to the current action only; any future development proposals that are not part of the proposed Project will be subject to their own consistency determinations and potential subsequent CEQA review.

## D. CEQA Framework for Addendum

CEQA Guidelines sections 15162 and 15164 provide that an addendum to an adopted MND may be prepared when the conditions for subsequent or supplemental review are not present. (CEQA Guidelines, § 15164.)<sup>2</sup> Subsequent or supplemental review is only required when substantial changes to a project require major revisions of a previous environmental document due to new or increased substantial environmental impacts, or where new information of substantial importance has been uncovered that indicates the project would create new impacts or increase the severity of existing impacts. (CEQA Guidelines, §§ 15162, subd. (a), 15164, subd. (b).) Subsequent environmental review is only necessary if one or more of the following has occurred:

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<sup>1</sup> / See *Save Our Heritage Organisation v. City of San Diego* (2018) 28 Cal.App.5th 656, 668.

<sup>2</sup> / When project changes “[do] not raise any new effects which the [MND] had not already reviewed and analyzed” then preparation of a subsequent environmental document is not warranted. (*River Valley Preservation Project v. Metropolitan Transit Development Bd.* (1995) 37 Cal.App.4th 154, 177; see also *Santa Teresa Citizen Action Group v. City of San Jose* (2003) 114 Cal.App.4th 689, 704.)

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- Substantial changes are proposed for the project that will require major revision of a previous Negative Declaration due to the involvement of new, significant environmental effects or a substantial increase in the severity of previously identified effects;
- Substantial changes with respect to the circumstances under which the project is undertaken, requiring major revision to a previous Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified ones;
- New information of substantial importance that was not known or could not have been known without the exercise of reasonable diligence at the time the previous Negative Declaration was adopted shows any of the following:
  - The project will have one or more significant effects not discussed in the previous Negative Declaration.
  - Significant effects previously examined will be substantially more severe than disclosed in the previous Negative Declaration.
  - Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt them.
  - Mitigation measures or alternatives that are considerably different from those analyzed in the previous document would substantially reduce one or more significant effects, but the project proponents decline to adopt the measures or alternative.

## II. PROJECT DESCRIPTION

The Project is a resort hotel expansion to the existing Allegretto Resort proposing to add 93 lodging rooms (hotel suites, villas, spa suites), accessory uses/buildings including a conference center, viticulture building, and recreational activities such as a swimming pool and pickleball courts. The project is proposed to be constructed on portions of the existing Allegretto site and on the adjacent 10.8- acre vacant land

The requested land use approvals and entitlements for the Project include: (1) a Planned Development & Conditional Use Permit Amendment; (2) a General Plan Amendment; (3) a rezone from Public Facilities to Parks and Open Space with Resort-Lodging Overlay, and (4) an amendment to the Borkey Area Specific Plan.

The Project includes the following components:

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BLDG. NO.	PROPOSED USE	SQUARE FOOTAGE*±/ USE
1	Hotel, restaurant, and amenities	134,014
3	Conference center	15,150
4	Restaurant, employee facilities, and offices	8,689+5,187
5	Hotel, spa, and amenities	48,919
6	Restrooms, pool bar, and equipment	2,169
7	Hotel	39,827
9	Chapel and events	2,757
10	Bar and catering kitchen	2,954
14	Restrooms, storage, and picnic shelter	1,836
16	Viticulture Building – demonstration, classroom, limited wine production	15,000
17	Hotel suites	29,400

Additionally, the Project will incorporate a number of actions designed to reduce greenhouse gas emissions consistent with the City’s Climate Action Plan as follows:

- LED fixtures will be used throughout the Project.
- All buildings will be “solar ready”
- EV ready parking spaces will be provided pursuant to the California Green Building Code
- Shaded exterior patio areas for employee and customer use will be provided
- Inclusion of internal pedestrian connectivity
- Inclusion of trash enclosures/waste receptacles for solid waste, recyclables, and organic waste

The project is proposed to be constructed in multiple construction phases.

### III. CONSISTENCY DETERMINATION

The pre-existing Allegretto Resort project site has been previously analyzed under CEQA and approved for the development of similar hotel, recreation, and dining uses. The environmental determinations for the Allegretto Resort included environmental review in accordance with CEQA resulting in the 2012 MND. The previous MND analyzed the development of the Project site and addressed the anticipated development of these parcels as a resort hotel.

The 2012 MND adopted for APNs 025-410-019, 025-410-020, and 025-410-021 addressed potentially significant environmental impacts and established development standards for the anticipated development of a resort hotel like the Project. Additionally, the 2012 MND previously approved the rezone of APNs 025-410-019, 025-410-020, and 025-410-021 to a Parks and Open Space with Resort-Lodging Overlay; however, APN 025-410-004 is currently zoned for Public Facilities.

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The Project consists of three additional hotel buildings, villas, and recreational and gathering spaces, including a pool and convention center, which requires a Planned Development permit (PD) and a subsequent rezone and general plan amendment. The Project is consistent with applicable regulations including the City's zoning regulations, the existing tract approvals, and associated environmental review. The 10.8 acre site remains non-developed and is covered with native grasses, the same condition of when it was studied in 2012. Current analysis has identified no new significant effects. With adoption of the conditions of approval and mitigation measures previously identified in conjunction with the previous MND any significant effects previously identified would be mitigated to a less-than-significant level.

## IV. ENVIRONMENTAL ANALYSIS

### A. Description of Environmental Checklist

The checklist includes the full range of environmental issues presented in the most recent version of Appendix G of the CEQA Guidelines. After adoption of the MND, CEQA Guidelines underwent a comprehensive update, effective December 28, 2018.<sup>3</sup> Although not required,<sup>4</sup> the checklist categories in this Addendum follow the updated Appendix G of the CEQA Guidelines in order to provide the most updated information to decisionmakers.<sup>5</sup> Pursuant to CEQA Guidelines section 15162, this checklist evaluates environmental topics in terms of any "changed condition" (i.e., changed circumstances, project changes, or new information of substantial importance) that may result in a different environmental impact significance conclusion than that reached in the MND. If the situations described in CEQA Guidelines section 15162 are not present, then no subsequent EIR or initial study/negative declaration is required, and an addendum is the appropriate CEQA document.

The column headings in the checklist have been modified from the Appendix G version to assess whether the conditions described in CEQA Guidelines section 15162 are present. The checklist offers the following: (1) identification of the earlier analyses and where they are available in prior document(s) for review; (2) discusses whether proposed deviations from the previously analyzed program would involve new or substantially more severe significant impacts; (3) discusses whether new circumstances surrounding the previously-analyzed program would involve new or substantially more severe significant impacts; (4) discusses any substantially important new information requiring new analysis; and (5) describes the mitigation measures that

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<sup>3</sup> See Senate Bill 743 (2018).

<sup>4</sup> See *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 17 Cal.App.5th 413, 426 ["once an EIR is finally approved, a court generally cannot ... compel an agency to perform further environmental review if new regulations or guidelines for evaluating the project's impacts are adopted in the future"]; *Citizens Against Airport Pollution v. City of San Jose* (2014) 227 Cal.App.4th 788, 808 [CEQA Guidelines enacted after an EIR is certified are not "new information within the meaning of Public Resources Code section 21166, subdivision (c)" and therefore do not trigger preparation of subsequent environmental review nor require consideration in an addendum].

<sup>5</sup> See Public Resources Code sections 21002.1, subdivision (e), 210065; CEQA Guidelines, §§ 15002, subdivision (a)(1), 15003, subdivision (c).

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were incorporated from the prior document(s) and the extent to which they address any site specific conditions for the Project. (CEQA Guidelines, § 15162, subdivision (a).) Each column is described in more detail below. The issue-area checklists are followed by a discussion that explains the results and provides site-specific analysis as warranted.

## 1. Where Was Impact Analyzed?

This column references the pages of the previous MND, Biological Resources Assessment, Air Quality and Greenhouse Gas Impact Assessment, or Transportation Analysis where information and analysis relative to the environmental issue at hand can be found.

## 2. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Pursuant to CEQA Guidelines section 15162, subdivision (a)(1), this column indicates whether proposed changes (if any) represented by the Project will result in new significant impacts not disclosed in the 2012 MND or that the Project will result in substantial increases in the severity of previously identified significant impact. A “yes” answer is only required if such new or worsened significant impact will require “major revisions of the previous EIR or negative declaration.” If a “yes” answer is given, additional mitigation measures or alternatives may be needed. Conversely, a “no” answer does not mean that there are no potential impacts relative to the environmental issues, but only that there is no change in the condition or status of the impact since it was analyzed and addressed with mitigation measures in the prior approved environmental documents.

## 3. Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?

Pursuant to CEQA Guidelines section 15162, subdivision (a)(2), this column indicates whether changed circumstances affecting the Project will result in new significant impacts not disclosed in the 2012 MND or will result in substantial increases in the severity of previously identified significant impacts. A “yes” answer is only required if such new or worsened significant impacts will require “major revisions of the previous EIR or negative declaration.” A “yes” answer is only required if such new or worsened significant impacts will require “major revisions of the previous EIR or negative declaration.” If a “yes” answer is given, additional mitigation measures or alternatives may be needed. Conversely, a “no” answer does not mean that there are no potential impacts relative to the environmental issue, but only that there is no change in the condition or status of the impact since it was analyzed and addressed with mitigation measures in the prior approved environmental documents.

## 4. Any New Information of Substantial Importance Requiring New Analysis or Verification?

Pursuant to CEQA Guidelines section 15162, subdivision (a)(3), this column indicates whether new information “of substantial importance” is available requiring an update to the

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analysis of the 2012 MND to verify that the environmental conclusions and mitigations remain valid. Any such information is only relevant if it “was not known and could not have been known with reasonable diligence at the time of the previous EIR.” To be relevant in this context, such new information must show one or more of the following:

- (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
- (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR or negative declaration;
- (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR or negative declaration would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measures or alternative.

This category of new information may apply to any new regulations enacted after certification of the prior EIR or adoption of the prior negative declaration, which might change the nature of analysis of impacts or the specifications of a mitigation measure. If the new information shows the existence of new significant effects or significant effects that are substantially more severe than were previously disclosed, then new mitigation measures should be considered. If the new information shows that previously rejected mitigation measures or alternatives are now feasible, such measures or alternatives should be considered anew. If the new information shows the existence of mitigation measures or alternatives that are (i) considerably different from those included in the prior EIR or negative declaration, (ii) able to substantially reduce one or more significant effects, and (iii) unacceptable to the project proponents, then such mitigation measures or alternatives should also be considered.

## 5. What Prior Environmental Document’s Mitigation Measures Address Impacts

Pursuant to Public Resources Code section 21083.3, this column indicates whether the 2012 MND and/or the findings adopted by the lead agency provides mitigation measures to address effects in the related impact category. In some cases, the mitigation measures have already been implemented. A “yes” response will be provided in either instance. If “n/a” is indicated, this environmental review concludes that the impact does not occur with this Project and therefore no mitigation is needed.

### **B. Prior Analysis and Background Materials**

Earlier analyses may be used where, pursuant to tiering, program EIR, or other CEQA process, one or more effects have been adequately analyzed in an earlier EIR or negative declaration. Section 15063 (c)(3)(D). All documents are available for review at the City of Paso Robles Community Development Department - 1000 Spring Street, Paso Robles, CA 93446.

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<b>REFERENCED ACRONYM</b>	<b>DOCUMENT TITLE</b>
AIS	Archaeological Inventory Survey for a Parcel at 2700 Buena Vista Drive, Paso Robles, San Luis Obispo County, California
AQGHG	Air Quality and Greenhouse Gas Impact Assessment for Allegretto Resort Expansion Project
BRA	Biological Resource Assessment for Allegretto Resort Expansion
MND	Mitigated Negative Declaration for Ayres Hotel, 2012
TA	Allegretto Expansion, Paso Robles – Transportation Analysis
WDM	Water Demand Memo

C. Checklist and Discussion

<b>1. AESTHETICS.</b>					
<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any “major revisions” to existing MND related to new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Have a substantial adverse effect on a scenic vista?	MND, p. 5	No	No	No	<b>None required.</b>
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	MND, p. 5	No	No	No	<b>None required.</b>
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	MND, p. 5	No	No	No	<b>None required.</b>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	MND, p. 5	No	No	No	<b>None required.</b>

**Discussion:** The project site is visible from Highway 46 East and surrounding local roadways. It is within an urbanized area of the City and is surrounded by development, including a hotel, community college, commercial uses, and residences.

The visual quality of the site is moderately high since it is undeveloped open grassland visible from the nearby roads.

The site is not within or adjacent to a scenic vista, gateway, or scenic highway as designated by the City’s General Plan or other adopted plans or policies. Therefore, the project could not result in a substantial impact on scenic resources.

The proposed buildings and site lighting including parking lot light standards will not result in significant new light or glare onto the surrounding properties. The light fixtures comply with the City’s requirements for light shielding (21.82.020.H-1 ) and would be downcast to not shed light on adjacent property. Therefore, the proposed project will result in less than significant impacts from light or glare.

The project does not involve any element that might result in a new significant or substantially more severe impacts to aesthetics. The Project is subject to the submittal of a development plan (PD) as contemplated in the MND. Approval of the PD requires the Planning Commission to make specific findings, including that the Project would not have an adverse effect on public views from nearby roadways and other public vantage points

and that the design and intensity of the Project would not be a disharmonious or disruptive element of the neighborhood. Consistent with the MND, the PD process would ensure that the Project is developed in a manner that does not degrade existing visual character and quality.

**Mitigation Measures:** None required.

**Conclusion:** The project would not have any new significant or substantially more severe impacts to aesthetic resources (CEQA Guidelines § 15162(a)).

**2. AGRICULTURE AND FOREST RESOURCES.**

<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	MND, p. 6	No	No	No	<b>None required.</b>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	MND, p. 6	No	No	No	<b>None required.</b>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	MND, p. 6	No	No	No	<b>None required.</b>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	MND, p. 6	No	No	No	<b>None required.</b>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	MND, p. 6	No	No	No	<b>None required.</b>

**Discussion:** The City General Plan; Open Space Element in Figure OS-1, State Farmland Mapping and Monitoring Program (FMMP); identifies soil of “Farmland of Local Importance” within the Project. Although the

project site includes soil of “Farmland of Local Importance,” neither the site or surrounding uses are currently used for agricultural purposes, and current zoning, Public Facilities, would not permit such uses on site.

The project area is not under Williamson Act contract. Therefore, the site does not include any current or future agricultural lands and would not convert Prime, Unique or Farmland of Statewide Importance to other uses. Therefore, this project would result in less than significant impacts to agricultural soils monitored in the State FMMP.

No forestland is located within the Project; therefore, the Project will not result in conflicts with existing zoning or case the rezoning of forestland.

Similarly, since there are no forestlands within the Project, the Project will not result in the loss of forestland or the conversion of forestland to non-forest uses.

Neither the site nor surrounding parcels are currently used for agricultural purposes, and current zoning, Public Facilities, would not permit such uses on site. Since no agricultural or farmland uses exist on-site or are allowed by current zoning, the Project will no result in the conversion of farmland into non-agricultural uses.

**Mitigation Measures:** None required.

**Conclusion:** The project would not have any new significant or substantially more severe impacts to agricultural or forest resources (CEQA Guidelines § 15162(a)).

<b>3. AIR QUALITY.</b>					
<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Conflict with or obstruct implementation of the applicable air quality plan?	AQGHG, p. 16-17	No	No	No	<b>MM AQ-1, AQ-2</b>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	AQGHG, p. 17-24	No	No	No	<b>MM AQ-1, AQ-2</b>
c. Expose sensitive receptors to substantial pollutant concentrations?	AQGHG, p. 25	No	No	No	<b>MM AQ-1, AQ-2</b>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	AQGHG, p. 25-26	No	No	No	<b>None required.</b>
<p><b>Discussion:</b> The proposed project complies with the San Luis Obispo County Air Pollution Control District (SLOAPCD) Clean Air Plan (CAP) by reducing regional vehicle miles traveled (VMT), providing pedestrian and bicycle infrastructure improvements, and implementing MM GHG-1c, which requires the construction of EV Ready parking spaces and charging stations. However, particulate matter generated during construction exceeds the standards outlined in SB 656 and poses a potentially significant impact. MM AQ-1 and AQ-2 both assist in reducing PM emissions during construction and are consistent with SLOAPCD’s airborne PM-reduction efforts, which lowers the impact to less than significant.</p> <p>Construction of the Project would result in the temporary generation of emissions associated with clearing, site prep, grading, building construction, paving, motor vehicle exhaust associated with construction equipment,</p>					

and worker trips, as well as the movement of construction equipment on unpaved surfaces, which have the potential to present a significant air quality impact. Maximum daily emissions comply with SLOAPCD’s significance threshold. However, the project’s construction would exceed SLOAPCD’s quarterly maximum significance threshold. Implementation of MMs AQ-1 and AQ-2 include SLOAPCD-recommended standard and best available control measures to reduce construction-generated emissions of fugitive dust, mobile-source emissions associated with construction vehicles and equipment, and evaporative emissions from architectural coating (e.g. low VOC-emission paint), which leads to a less than significant impact on GHG emissions.

The proposed project does not include any equipment or land uses that are considered major emission sources, and operational GHG emissions would be concentrated in mobile sources and area sources, including landscape maintenance. Operational uses have a minimal potential of producing a net increase in pollutants and a limited potential threat to public health. The site is not located in a naturally occurring-asbestos area as identified by SLOAPCD, and the most significant pollutant concentrations for sensitive communities would be localized construction PM. Implementing MM AQ-1 and AQ-2 would minimize impacts to sensitive communities by lowering construction emission generation, including PM, to create a less than significant impact.

Other emissions, such as odors, may be produced during construction through diesel-powered equipment, exhaust fumes, and pavement and architectural coatings. However, none of these sources pose a potential health concern and would only occur intermittently throughout the workday. To further mitigate these odors, the implementation of MM AQ-1 and AQ-2 limit construction equipment idling and require the use of newer, cleaner equipment and vehicles.

Please note that the March 2025 AQ/GHG Assessment that was prepared for the Allegretto Expansion Project provides mitigation measures AQ-1 and AQ-2. AQ-2 is the same mitigation measure as AQ-1 in the 2012 MND. AQ-2 is an added mitigation measure in the 2025 Assessment. The Assessment states that AQ-1 and AQ-2 are standard and best management practices. The listed measures are standard measures to reduce construction generated emissions of fugitive dust , mobile source emissions, associated with construction vehicles and equipment. While these measures are outlined as mitigation measures, the are also required for projects that do not meet the thresholds for , and AQ-2 in the Addendum are the same mitigation measure. With this Addendum, AQ-1 has been added.

**Mitigation Measures:** MMs AQ-1, AQ-2.

**Conclusion:** With the implementation of MM AQ-1 and 2, the project would not have any new significant or substantially more severe impacts to air quality (CEQA Guidelines, § 15162(a)).

<b>4. BIOLOGICAL RESOURCES.</b>					
<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	Dec. 2025 BRA 4.1, 4.3, 4.4	No	No	No	<b>MM BIO 1 through 16</b>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	BRA 3.6	No	No	No	<b>None required.</b>

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c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	BRA 3.5	No	No	No	<b>None required.</b>
d. Interfere substantially with the movement of any native resident or migratory fish and wildlife Species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	BRA 3.8.3	No	No	No	<b>None required.</b>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	BRA 4.2	No	No	No	<b>None required.</b>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	BRA 1.5, 1.6	No	No	No	<b>None required.</b>

**Discussion:** No sensitive habitats have been identified on the proposed project site, including wetlands or riparian habitats. Therefore, the project poses no potential harm to sensitive habitats. The area is classified as California annual grassland habitat, and 10.8 acres will be permanently removed. Habitat removal poses a significant impact if special status species reside within the area. Potential special status species on-site include the golden eagle, burrowing owl, Crotch’s bumble bee, ferruginous hawk, Salinas pocket mouse, western spadefoot, American badger, and San Joaquin kit fox. However, no special status species have been observed on-site, which indicates a less than significant impact on habitats and sensitive species. MMs BIO 1 through 13 require a survey for sensitive species prior to beginning construction and include measures to protect sensitive species if they are later observed on-site.

Wildlife movement and connectivity are constrained in the Study Area by surrounding development. The surrounding developed areas are residential, rural residential, educational, and commercial, with limited open land to the east and north. South of the Study Area is Highway 46, which is lined with a mix of commercial development including a hotel and shopping centers, and residential and rural residential housing that have removed most natural habitat for many miles. West of the property is residential for 0.6 miles, followed by the Salinas River and then Highway 101. East of the Study Area is a mosaic of rural residences, industrial areas, and agriculture fields. North of the Study area is Cuesta College, rural residential housing, and agriculture fields. Habitat within the Study Area is usable by wildlife and development would reduce the amount of wildlife habitat available. Although it would contribute to a reduction in the ability of wildlife to move through the area, development in the Study Area would not create a new barrier to an existing corridor since ground movement of wildlife is already constrained by significant development in adjacent areas in the north, south, east, and west.

There are no Habitat or Natural Community Conservation Plans related to the proposed project site. However, two Oak trees have been observed on-site and are protected under local policy. The proposed project does not plan for the removal of these trees and will not disturb the Critical Root Zone (CRZ).

**Mitigation Measures:** MMs BIO 1 through 12.

**Conclusion:** With implementation of the above MMs, the project would not have any new significant or substantially more severe impacts to biological resources (CEQA Guidelines § 15162(a)). With the 2026 project the same mitigation measures as the 2012 MND, except since 2012 it has been determined that this site is within the City’s Kit Fox Exemption area for in-lieu fee requirements, since the site is considered entitled (Cuesta College site). Additionally, since 2012 the Crotch Bumble Bee has been included as a Special Status Species and has been included in requirement for survey prior to start of grading.

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<b>5. CULTURAL RESOURCES.</b>					
<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?	AIS, p. 15	No	No	No	<b>None required.</b>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	AIS, p. 15	No	No	No	<b>None required.</b>
c. Disturb any human remains, including those interred outside the formal cemeteries?	AIS, p. 15	No	No	No	<b>None required.</b>
<p><b>Discussion:</b> There are no historic, archaeological, or paleontological resources located on the site or in the near vicinity. Since the property is not located within proximity to a creek, river, or known cultural resource it is unlikely that resources are located on the site. An archaeological survey was conducted for the 2026 project, and no artifacts were found and there was no evidence of any historic, archaeological, or paleontological resources. The State Native American Heritage Commission (NAHC) and all known local tribes have been contacted to determine if this property is a “sacred site” in accordance with Senate Bill 18. No Native American Tribes have reported that this property was previously used by Native Americans or that it is a sacred site. If any artifacts are discovered at any point during development, all construction will stop until a qualified archaeologist is contacted and has assessed the artifact.</p> <p>As a result of the Archeological Study, it is not anticipated that there are human remains on the project site, however if human remains are found during site disturbance, all grading and/or construction activities shall stop, and the County Coroner shall be contacted to investigate. The Coroner will handle the situation in a manner consistent with Public Resources Code 5097.98 or equivalent protocol by the Sherrif’s Department.</p> <p><b>Mitigation Measures:</b> None required.</p> <p><b>Conclusion:</b> The project would not have any new significant or substantially more severe impacts to cultural resources (CEQA Guidelines § 15162(a)).</p>					

<b>6. ENERGY.</b>					
<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources,	Not addressed.	No	No	No	<b>None required.</b>

during project construction or operation?					
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Not addressed.	No	No	No	<b>None required.</b>
<p><b>Discussion:</b> Construction activities at the Project site would be temporary and consist of site preparation, grading, construction of buildings, paving, and installation of landscaping. The construction sequencing will be designed to be efficient to avoid excess monetary costs. In other words, equipment and fuel are not typically used wastefully onsite because of the added expense associated with renting the equipment, as well as maintenance and fuel. Project construction would meet applicable state and federal energy policies or standards established for equipment and vehicle efficiency.</p> <p>The project will be required to meet all building/energy codes when going through the building permit process. The site was originally anticipated to be a college campus; it is not anticipated that energy use would be significant for the proposed project.</p> <p>The City is not aware of any new circumstances or new information that might result in new significant or substantially more severe energy impacts in relation to the Project.</p> <p><b>Mitigation Measures:</b> None required.</p> <p><b>Conclusion:</b> The project would not have any new significant or substantially more severe impacts to energy consumption (CEQA Guidelines § 15162(a)).</p>					

<b>7. GEOLOGY AND SOILS.</b>					
<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: <ul style="list-style-type: none"> <li>i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.</li> <li>ii. Strong seismic ground shaking?</li> <li>iii. Seismic-related ground failure, including</li> </ul>	MND, p. 15	No	No	No	<b>None required.</b>

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liquefaction? iv. Landslides?					
b. Result in substantial soil erosion or the loss of topsoil?	MND, p. 16	No	No	No	<b>None required.</b>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	MND, p. 16	No	No	No	<b>None required.</b>
d. Be located on expansive soil, as defined in Table 18- 1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	MND, p. 16	No	No	No	<b>None required.</b>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	MND, p. 16	No	No	No	<b>None required.</b>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	MND, p. 14	No	No	No	<b>None required.</b>

**Discussion:** There are two known fault zones on either side of the Salinas Rivers valley. The Rinconada Fault system runs on the west side of the valley and grazes the City on its western boundary. The San Andreas Fault is on the east side of the valley and is situated about 30 miles east of Paso Robles. The City of Paso Robles recognizes these geologic influences in the application of the California Building Code (CBC) to all new development within the City. Review of available information and examinations indicate that neither of these faults is active with respect to ground rupture in Paso Robles. Soils and geotechnical reports and structural engineering in accordance with local seismic influences would be applied in conjunction with any new development proposal. Based on standard conditions of approval, the potential for fault rupture and exposure of persons or property to seismic hazards is not considered significant. There are no Alquist-Priolo Earthquake Fault Zones within City limits.

Per the General Plan EIR, the project site is located in an area with soil conditions that have a low potential for liquefaction or other type of ground failure due to seismic events and soil conditions. To implement the EIR's mitigation measures to reduce this potential impact, the City has a standard condition to require submittal of soils and geotechnical reports, which include site-specific analysis of liquefaction potential for all building permits for new construction, and incorporation of the recommendations of said reports into the design of the project. Additionally, the project site is in an area that is designated a low-risk area for landslides. Therefore, potential impacts due to landslides is less than significant.

Per the General Plan EIR the soil condition is not erosive, expansive, or otherwise unstable. As such, no significant impacts are anticipated. A geotechnical/soils analysis has been conducted to evaluate the site specific soil stability and suitability of grading and retaining walls proposed. This study outlines the best management practices for grading techniques and erosion control plan to ensure that potential impacts due to soil stability will not occur.

The development will be connected to the City's municipal wastewater system, therefore there would not be impacts related use of septic tanks.

**Mitigation Measures:** None required.

**Conclusion:** The project would not have any new significant or substantially more severe impacts to geology and soils (CEQA Guidelines § 15162(a)).

<b>8. GREENHOUSE GAS EMISSIONS.</b>					
<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	AQGHG, p. 16-17	No	No	No	<b>MMs AQ-2, GHG-1</b>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	AQGHG, p. 16-17	No	No	No	<b>MMs AQ-2, GHG-1</b>
<p><b>Discussion:</b> Short-term construction emissions and long-term operational emissions of the proposed project were calculated using the California Emissions Estimator Model (CalEEMod), version 2022.1.1.29, computer program. Based on the modeling conducted, most increases in GHG emissions would result from construction, vehicle use, and energy consumption. The proposed project would lead to an overall reduction in regional vehicle miles traveled (VMT) which complies with the County of San Luis Obispo 2023 Regional Transportation Plan, Sustainable Communities Strategy. However, the proposed project does not include the required best management practices (BMPs), prohibit the installation of natural gas-fueled appliances, or require EV Ready spaces that would support SC 32 2030 target of carbon neutrality by 2045, as outlined in California’s 2022 Climate Change Scoping Plan.</p> <p>To mitigate these potentially significant impacts, the project will implement MM AQ-2 and GHG-1. GHG-1a requires the installation of EV-ready parking spaces that are compliant with 2045 carbon neutrality goals. And to offset future GHG emissions from natural gas appliances, MM GHG-1c and AQ-2 would mitigate GHG emissions from waste generation and construction. After applying MM AQ-2 and GHG-1, the potential impacts of GHG emissions comply with local and state air quality goals and standards and are considered less than significant.</p> <p>The proposed GHG-1 mitigation would revise the original GHG-1 mitigation. Both mitigation measures require the applicant to prepare a GHG Reduction Plan.</p> <p><b>Mitigation Measures:</b> MMs AQ-2, GHG-1.</p> <p><b>Conclusion:</b> With implementation of the above MMs, the project would not have any new significant or substantially more severe impacts related to GHG emissions (CEQA Guidelines § 15162(a)).</p>					

<b>9. HAZARDS AND HAZARDOUS MATERIALS.</b>					
<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	MND, p. 20	No	No	No	<b>None required.</b>

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b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	MND, p. 20	No	No	No	<b>None required.</b>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one- quarter mile of an existing or proposed school?	MND, p. 20	No	No	No	<b>None required.</b>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	MND, p. 21	No	No	No	<b>None required.</b>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	MND, p. 21	No	No	No	<b>None required.</b>
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working on the project area?	MND, p. 21	No	No	No	<b>None required.</b>
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	MND, p. 21	No	No	No	<b>None required.</b>
h. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	MND, p. 21	No	No	No	<b>None required.</b>

**Discussion:** Construction of the project would involve the temporary transport, use, and disposal of common construction materials including paints, adhesives, surface coatings, cleaning agents, fuels, and oils that are typically associated with any urban development project.. These materials associated with construction activities would be used and stored in accordance with manufacturers’ instructions and handled in compliance with applicable standards and regulations, which minimizes the potential risk associated with construction-related hazardous materials. Besides the construction materials, the project does not include use of, transport, storage or disposal of hazardous materials that would create a significant hazard to the public or environment.

The project is not identified as a hazardous site per Government Code section 65962.5, and the site (existing and new) is not situated near an airport safety zone. Although the project is situated within a quarter mile of a

school, Cuesta College North County Campus, besides the common construction materials described above, the project will not emit or transport hazardous materials during or after construction. Therefore, the project does not pose any potential threat related to hazardous materials.

The project does not involve any element that might result in a new significant or substantially more severe hazards or hazardous materials impacts. Any hazards or hazardous materials impacts that may occur as a result of the project would be within the scope of those discussed in the MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe hazards or hazardous materials in relation to the Project.

**Mitigation Measures:** None required.

**Conclusion:** The project would not have any new significant or substantially more severe impacts related to hazards and hazardous materials (CEQA Guidelines § 15162(a)).

<b>10. HYDROLOGY AND WATER QUALITY.</b>					
<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	MND, p. 21	No	No	No	<b>None required.</b>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	MND, p. 22	No	No	No	<b>None required.</b>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: <ul style="list-style-type: none"> <li>i. would result in substantial erosion or siltation on- or off-site</li> <li>ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site</li> </ul>	MND, p. 22	No	No	No	<b>None required.</b>

iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff iv. impede or redirect flood flows					
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	MND, p. 23	No	No	No	<b>None required.</b>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	MND, p. 23	No	No	No	<b>None required.</b>

**Discussion:** The proposed project is designed to retain stormwater on-site through installation of various low-impact development (LID) features. The project was been designed to reduce impervious surfaces, preserve existing vegetation, and promote groundwater recharge by employing bioretention through implementation of these measures. Thus, water quality standards will be maintained and discharge requirements will be in compliance with State and local regulations. Therefore, impacts to water quality and discharge will be less than significant.

The proposed project would be on the City’s municipal water supply system, therefore it could not individually impact nearby well production. The site is designed to reduce impervious surfaces where possible and to direct surface drainage to onsite retention systems to facilitate groundwater recharge. The City has sufficient groundwater resource capacity in combination with surface water resources to adequately serve this project. Therefore, this project would not substantially deplete groundwater supplies impacts to groundwater resources would be less than significant.

The drainage pattern on the site would not be substantially altered with development of this project since the project largely maintains the existing, historic drainage pattern of the property, and drainage will be maintained on the project site. Additionally, surface flow would be directed to historic drainage areas for percolation in bioswale drainage features at the southwest corner of the property. There are no streams, creeks or rivers on or near the project site that could be impacted from this project or result in erosion or siltation on- or off-site. Therefore, impacts to drainage patterns and facilities would less than significant.

There is no housing associated with this project nor is there any housing in the near vicinity downstream from the site and the site is not within or near a flood hazard area. Therefore this project could not result in flood related impacts to housing.

In accordance with the Paso Robles General Plan, there is no mudflow hazards located on or near the project site. Therefore, the project could not result in mudflow inundation impacts.

The project will implement the City’s Storm Water Management Plan - Best Management Practices, and would therefore not conflict with these measures.

The project will incorporate all feasible means to manage water runoff on the project site. There is no wetland or riparian areas in the near vicinity, and the project could not result in impacts to aquatic habitat. Therefore, the project will not result in significant impacts to these resources.

**Mitigation Measures:** None required.

**Conclusion:** The project would not have any new significant or substantially more severe impacts to hydrology and water quality (CEQA Guidelines § 15162(a)).

**11. LAND USE AND PLANNING.**

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<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Physically divide an established community?	MND, p. 24	No	No	No	<b>None required.</b>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	MND, p. 24	No	No	No	<b>None required.</b>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	MND, p. 24	No	No	No	<b>None required.</b>
<p><b>Discussion:</b> The project is largely surrounded by non-residential land uses, except for the residential neighborhood along the southeast border of the Project. The Project borders the established community but will not divide it.</p> <p>The site is currently zoned for Public Facilities and is vacant. The project scope includes amendments to the General Plan Land Use designation and zoning of the site to Parks and Open Space with a Resort Lodging Overlay. The proposed change of land use designation and zoning would complement and be compatible with the surrounding land.</p> <p>No sensitive habitats or species were observed on-site and no habitat conservation plans or natural community conservation plans established in this area of the City. Therefore, there would be no conflicts with a habitat conservation plan or natural community conservation plan.</p> <p><b>Mitigation Measures:</b> None required.</p> <p><b>Conclusion:</b> The project would not have any new significant or substantially more severe impacts to land use and planning (CEQA Guidelines § 15162(a)).</p>					

<b>12. MINERAL RESOURCES.</b>					
<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	MND, p. 24	No	No	No	<b>None required.</b>
b. Result in the loss of availability of a locally important mineral	MND, p. 24	No	No	No	<b>None required.</b>

resource recovery site delineated on a local general plan, specific plan or other land use plan?					
<p><b>Discussion:</b> There are no known mineral resources at this project site; therefore, the Project will not result in the loss of availability of a known mineral resource.</p> <p>There are no locally important mineral resource recovery sites located on-site. The Project will not result in the loss of locally important mineral resource recovery sites.</p> <p>The project does not involve any element that might result in a new significant or substantially more severe impacts to mineral resources. Any impacts to mineral resources that might occur as a result of the Project would be within the scope of those discussed in the 2012 MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe impacts to mineral resources in relation to the Project.</p> <p><b>Mitigation Measures:</b> None required.</p> <p><b>Conclusion:</b> The project would not have any new significant or substantially more severe impacts to mineral resources (CEQA Guidelines § 15162(a)).</p>					

<b>13. NOISE.</b>					
<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	MND, p. 25	No	No	No	<b>None required.</b>
b. Generation of excessive groundborne vibration or groundborne noise levels?	MND, p. 25	No	No	No	<b>None required.</b>
c. For a project located within the vicinity of a private airstrip or an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	MND, p. 25	No	No	No	<b>None required.</b>
<p><b>Discussion:</b> The proposed project includes land uses such as lodging, retail, wellness center, viticulture building, and a restaurant, and it is not anticipated that these activities would create excessive noise that may impact surrounding properties. That being said, noise created from the project will be subject to the City’s Noise Ordinance that limits the amount of noise at certain times of the day. The project may result in short-term</p>					

construction noise and vibration from machinery. However, the construction noise is not anticipated to be excessive, and construction will only take place during daytime hours, 7 a.m. and 7 p.m. excluding Sundays and federal holidays. Therefore, impacts from groundborne vibration noise would be considered less than significant.

The project is not located within an airport area subject to an airport land use plan and will thus not be impacted by airport-related noise.

**Mitigation Measures:** None required.

**Conclusion:** The project would not have any new significant or substantially more severe impacts to noise (CEQA Guidelines § 15162(a)).

**14. POPULATION AND HOUSING.**

<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	MND, p. 25	No	No	No	None required.
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	MND, p. 26	No	No	No	None required.

**Discussion:** The project site is currently vacant. As there are no existing residential units, the project will not displace any people or housing.

The Project is consistent with the type of development contemplated in the MND. There are no residential units on the project site. The project does not involve any element that might result in a new significant or substantially more severe population and housing impacts. Any population and housing impacts that might occur as a result of the project would be within the scope of those discussed in the MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant substantially more severe population and housing impacts in relation to the project.

**Mitigation Measures:** None required.

**Conclusion:** The project would not have any new significant or substantially more severe impacts to population and housing (CEQA Guidelines § 15162(a)).

**15. PUBLIC SERVICES.**

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<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any the public services:	MND, p. 26	No	No	No	<b>None required.</b>
Fire protection?	MND, p. 26	No	No	No	<b>None required.</b>
Police protection?	MND, p. 26	No	No	No	<b>None required.</b>
Schools?	MND, p. 26	No	No	No	<b>None required.</b>
Parks?	MND, p. 26	No	No	No	<b>None required.</b>
Other public facilities?	MND, p. 26	No	No	No	<b>None required.</b>

**Discussion:** This project has been reviewed by the Fire Department, Public Works Department, and Utilities Division where those departments have provided any necessary conditions of approval to bring the project up to City Standards. With the construction of the project up to the city codes, the project will not be a significant impact on public services. The proposed project will not result in a significant demand for additional new services since it is not proposing to include new neighborhoods or a significantly large-scale development. The incremental impacts to services can be mitigated through payment of development impact fees.

Any public services impacts that might occur as a result of the Project would be within the scope of those discussed in the MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more public services impacts in relation to the Project.

**Mitigation Measures:** None required.

**Conclusion:** The project would not have any new significant or substantially more severe impacts to public services (CEQA Guidelines § 15162(a)). All required impact fees supporting public services will be paid at the appropriate time in the construction process, if not already paid for the subject parcels.

**16. RECREATION.**

<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Would the project increase the use of existing neighborhood and regional parks or other recreational	MND, p. 26	No	No	No	<b>None required.</b>

facilities such that substantial physical deterioration of the facility would occur or be accelerated?					
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	MND, p. 27	No	No	No	<b>None required.</b>
<p><b>Discussion:</b> The project is a resort type project that is designed to provide significant outdoor recreation space for its patrons, therefore the project would not significantly increase the use of city parks and facilities. This project does not require the construction of recreational facilities.</p> <p><b>Mitigation Measures:</b> None required.</p> <p><b>Conclusion:</b> The Project would not have any new significant or substantially more severe impacts to recreation (CEQA Guidelines § 15162(a)).</p>					

<b>17. TRANSPORTATION.</b>					
<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Conflict with a program plan, ordinance or policy establishing addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	TA, p. 13-14	No	No	No	<b>None required.</b>
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	TA, p. 4	No	No	No	<b>None required.</b>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	TA, Figure 1	No	No	No	<b>None required.</b>
d. Result in inadequate emergency access?	TA, p. 4	No	No	No	<b>None required.</b>
<p><b>Discussion:</b> A Traffic Analysis was prepared for the project by Central Coast Transportation Consulting, dated March 2025. The Memorandum summarized the transportation analysis for the project and addresses the environmental factors -17. Transportation a-d:</p> <p>(a) The proposed circulation system, including roadways, transit, and bicycle and pedestrian facilities all comply with existing plans, ordinances, and policies. The Project will improve bike lane and pedestrian path connectivity along Dallons Drive and Buena Vista Drive. Any new parking lots constructed will include pedestrian paths for safe travel. The transportation analysis also recommends space for a future bus stop along</p>					

Bunea Vista Drive to fulfill transit-based demand. (b) An updated traffic analysis has been conducted with Vehicle Miles Traveled (VMT) impact analysis in accordance with CEQA Guidelines section 15064.3, subdivision (b). In compliance with Office of Planning and Research (OPR) and County of San Luis Obispo thresholds, the analysis projects a reduction in regional VMT and a less-than significant impact on transportation. However, large-scale events could generate high traffic volumes, and a transportation management plan is recommended for events with 150 or more attendees.

(c) No hazardous geometric design features are included within or adjacent to the site’s circulation. The project proposes a driveway along Dallons Drive to access the equipment yard. Less vehicular traffic is expected within this area compared to the rest of the hotel parking; however, the existing horizontal curve and future landscaping and vegetation impedes sight distance. By restricting parking near the driveway, the design could improve visibility. The proposed driveway should comply with sight distance standards designated by San Luis Obispo County. All proposed uses are compatible within and adjacent to the circulation plans.

(d) Access points via existing driveways include Buena Vista Drive, Dallons Drive, and Experimental Station Road with an additional driveway proposed along Dallons Drive. These access points will provide adequate emergency access. The traffic analysis recommends an easement for a roadway between Dallons Drive and Experimental Station Road since the residential neighborhoods along Dallons Drive does not have secondary access. The project will not impede existing emergency access and is designed in compliance with all emergency access safety features and to City emergency access standards.

The March 2025 Transportation Analysis Memo included information beyond what is necessary to address impacts in this section of the Addendum. The information provided in Figure 1 – Site Plan and Recommendations and Figure 2 – Buena Vista Dr. Recommendations, is information requested by the City Engineer to determine what frontage improvement requirements the project may need to comply with City Engineering Standards. These recommendations have been reviewed by the City Engineer and have been incorporated in to the conditions of approval for the project at the discretion of the City Engineer.

**Mitigation Measures:** None required.

**Conclusion:** The Project would not have any new significant or substantially more severe impacts to transportation (CEQA Guidelines § 15162(a)).

<b>18. TRIBAL CULTURAL RESOURCES.</b>					
<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section	MND, p. 14	No	No	No	<b>None required.</b>

<p>5020.1(k), or          ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p>					
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**Discussion:** The Archaeological Survey (AIS) conducted a search and analysis of local records from the Central Coast Information Center and records from the California Historical Resources Information System (CHRIS) to identify any eligible or listed cultural resources. These records did not recognize any cultural resources within the revised project site. Additionally, the AIS includes correspondence with the Native American Heritage Commission (NAHC) in search of recognized sacred land or resources within the proposed project site. The NAHC did not have any sacred land or resources on file. Traditionally and culturally affiliated tribes were then contacted in search of any unlisted or unregistered lands and resources; no responses were received and no sacred lands or resources have been identified by local or state records or affiliated native tribes.

The AIS concluded that there is no evidence of significant cultural resources located on the subject property and no further archeological investigations are recommended. The Archeologist indicated that it is unlikely, due to the fact that no evidence of significant cultural resources was located on the subject property, no further archaeological investigations are recommended at this time.

**Mitigation Measures:** None required.

**Conclusion:** The project would not have any new significant or substantially more severe impacts to tribal cultural resources (CEQA Guidelines § 15162(a)).

<p><b>19. UTILITIES AND SERVICE SYSTEMS.</b></p>					
<p><i>Would the project:</i></p>	<p><i>Where was the impact analyzed?</i></p>	<p><i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i></p>	<p><i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i></p>	<p><i>Any new information of substantial importance requiring new analysis or verification?</i></p>	<p><i>What MND MMs address impacts?</i></p>
<p>a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?</p>	<p>MND, p. 28-29</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p><b>None required.</b></p>

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b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	WDM	No	No	No	<b>None required.</b>
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	WDM	No	No	No	<b>None required.</b>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	MND, p. 29	No	No	No	<b>None required.</b>
e. Comply with federal, state, and local statutes and regulations related to solid waste?	MND, p. 29	No	No	No	<b>None required.</b>

**Discussion:** The project will not require the construction of new facilities for wastewater, stormwater, or solid waste. Per the City's General Plan EIR, Urban Water Management Plan, and Sewer System Management Plan, the City's water and wastewater treatment facilities are adequately sized, including planned facility upgrades, to provide water needed and treat effluent resulting from this project. As for solid waste, the City's landfill has adequate capacity to accommodate construction related and operational solid waste disposal for this project, per the City's Landfill Master Plan. Additionally, the project will comply with all federal, state, and local solid waste regulations and will not generate solid waste in excess beyond state of local standards or capacity.

All new stormwater resulting from this project will be managed on the project site and will not enter existing storm water drainage facilities or require expansion of new drainage facilities. Therefore, the project will not impact the City's storm water drainage facilities.

The project does not involve any element that might result in a new significant or substantially more severe impacts to utilities and service systems. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe impacts to utilities and service systems in relation to the project.

**Mitigation Measures:** None required.

**Conclusion:** The project would not have any new significant or substantially more severe impacts to utilities and service systems (CEQA Guidelines § 15162(a)).

**20. WILDFIRE.** If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
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a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	MND, p. 19	No	No	No	<b>None required.</b>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Not addressed.	No	No	No	<b>None required.</b>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	Not addressed.	No	No	No	<b>None required.</b>

**Discussion:** As a part of the 2018 CEQA Guidelines update, the Appendix G checklist was revised to include Wildfire as a category of analysis. At the time the MND was prepared and certified, wildfire was addressed under Hazards and Hazardous Materials in the MND, and the Project was not within the vicinity of any wildland fire hazard areas. Currently, Cal Fire’s Fire Hazard Severity Zone Maps (2025) designates most of the project as a moderate fire hazard severity zone with the easternmost portion recognized as a high fire hazard severity zone. However, both zones are classified as local responsibility areas rather than state responsibility areas. Additionally, the Project is not located adjacent to or near any very high fire hazard zones (VHFH) or any state responsibility areas (SRA) since both the nearest VHFH zone and SRA are outside city limits.

The Project will not impair or interfere with adopted emergency response routes or plans.

The Project does not involve any element that might result in a new significant or substantially more severe wildfire impacts. According to the City’s 2025 LRA Fire Hazard Severity Zone Map, safety zones throughout the City are labeled Moderate, High, and Very High Fire. The subject site is within the Moderate safety zone, the lowest risk zone. Along with the standard conditions of approval related to fire sprinklers, vegetation management, fire hydrant locations, building setbacks, etc. this site has been evaluated in relation to impacts to wildfire, and impacts are less than significant.

**Mitigation Measures:** None required.

**Conclusion:** The project would not have any new significant or substantially more severe impacts to wildfire risk (CEQA Guidelines § 15162(a)).

## 21. MANDATORY FINDINGS OF SIGNIFICANCE.

<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Does the project have the potential to degrade the quality of the environment, substantially	MND, p. 30	No	No	No	<b>None required.</b>

EXHIBIT A

reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self- sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare or threatened species, or eliminate important examples of the major periods of California history or prehistory?					
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when view in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	MND, p. 30	No	No	No	<b>None required.</b>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	MND, p. 30	No	No	No	<b>None required.</b>

**Discussion:** Based on the discussions above and supporting reports, the project’s impacts related to habitat for wildlife species (San Joaquin Kit Fox) will be less than significant with mitigation incorporated. There will be no impact to fish habitat or fish and wildlife populations. The site is routinely maintained and mowed, so impact to fish, wildlife, of plant habitat is less than significant. The project consists of an expansion on a 10.8 acre site to an existing resort located on a 20-acre site. The proposed expansion project is in an area located in close proximity to a state highway, a community college, and existing developed residential neighborhoods. The project is being reviewed on a regional scale

The project will not have impacts that are individually limited, but cumulatively considerable. The project will not cause substantial adverse effects on human beings, either directly or indirectly.

The Project does not involve any element that might result in new significant or substantially more severe cumulative impacts. Any contribution to cumulative impacts would be within the scope of those discussed in the MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe cumulative impacts in relation to the Project.

**Mitigation Measures:** BIO-1 through 12, AQ-1, AQ-2.

**Conclusion:** Although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent.